

Joyce W. Lindauer
State Bar No. 21555700
Jeffery M. Veteto
State Bar No. 24098548
Guy H. Holman
State Bar No. 24095171
Joyce W. Lindauer Attorney, PLLC
12720 Hillcrest Road, Suite 625
Dallas, TX 75230
Telephone: (972) 503-4033
Facsimile: (972) 503-4034
Proposed Attorneys for Debtor

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE:

PAPPY'S TRUCKS LTD.,

Debtor.

§
§
§
§
§

**CASE NO. 19-33605-sgj
Chapter 11**

AFFIDAVIT OF RENA HUDDLESTON

STATE OF TEXAS)
)
COUNTY OF DALLAS)

On this day came before me, the undersigned notary public, Rena Huddleston, who being by me duly sworn stated under oath that he is over the age of 18, that he is competent to make this affidavit, and that the following is based upon his personal knowledge and is true and correct:

1. “My name is Rena Huddleston. I am an owner of Pappy’s Trucks Ltd. and make this Affidavit in support of Debtor’s Objection to BMO Harris Bank, N.A.’s Motion for Relief from Automatic Stay (the “Motion”) filed by BMO Harris Bank N.A. (“BMO Harris Bank”).

2. Pappy’s Trucks Ltd. (“Debtor”) admits that BMO Harris Bank has a security interest in the 2016 Kenworth W900 (Ser. No. 1NKWXPEX6GJ117704) and the 2016 Kenworth W900 (Ser. No. 1NKWXPEX8GJ117705) but denies that the Certificates of Title, attached as

Exhibit C to the Motion, in any way evidence perfection of a security interest in the 2016 Bridge King mixer (Ser. No. 110HZ1502246) and the 2016 Bridge King mixer (Ser. No. 110HZ1502247).

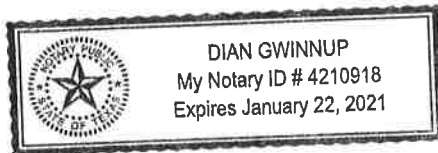
3. Debtor asserts that lifting of the stay to allow BMO Harris Bank to proceed with sale of the collateral would be detrimental to the Debtor. Debtor has received an offer to purchase the two trucks, which will maximize the recovery and allow payment to BMO Harris Bank in full. Debtor has filed the appropriate motion to sell the trucks.

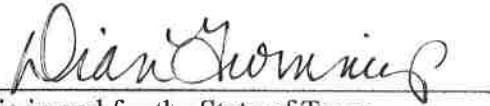
FURTHER AFFIANT SAYETH NOT."



Rena Huddleston
Pappy's Trucks Ltd.

Subscribed and sworn to before me this 12th day of February, 2020.





Notary Public in and for the State of Texas
Printed Name: Dian Gwinnup
Notary ID No. 4210918
My Commission Expires: 1-22-2021